

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

**LAROSSASA BROWN, Individually, and on
behalf of themselves and other similarly situated
current and former employees,**

Plaintiffs,

v.

**HUDDLE HOUSE, INC.,
a Georgia Corporation,**

Defendant.

Civil Action No.: 1:17-cv-173-SA-DAS

JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT

Plaintiff, Larossasa Brown (“Named Plaintiff”), individually and on behalf of all other similarly situated individuals who elect to join this collective action, by and through her undersigned counsel, and Defendant, Huddle House, Inc. (“Huddle House”), by and through its undersigned counsel, file this Joint Motion to Approve Settlement Agreement.

The parties respectfully request that the Court review and approve the terms of the proposed settlement of this collective action under the Fair Labor Standards Act, 29 U.S.C. § 216(b). The parties also request the Court to approve the proposed apportionment of the settlement proceeds, and the fairness, reasonableness, and adequacy of the proposed settlement.

The grounds for this motion are that the parties have reached an arms-length settlement of this matter after extensive, bona fide negotiations; that the Named Plaintiff, for herself and on behalf of all similarly situated individuals who elect to join this action, believe that

the proposed settlement is in the best interests of herself and all individuals who elect to join this action; and that all parties desire to conclude this matter without further expense, delay, and the uncertainty of continued litigation.

This motion is supported by **Exhibit A** (Settlement Agreement and Release of Claims), to be attached hereto under seal by the Clerk of Court and incorporated by reference¹, and the accompanying Memorandum of Law. The proposed Order is being sent to the Court via electronic mail.

Dated this 24th day of May, 2018.

/s/ George B. Ready

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*Attorneys for the Named Plaintiff, on behalf
of herself and all other similarly situated
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/s/Craig A. Cowart

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ATTORNEYS FOR DEFENDANT

¹ A Joint Motion to File Confidential Settlement Agreement Under Seal is pending. In the Motion, the parties request that the Settlement Agreement be filed as Exhibit A to this motion under seal.

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of May, 2018, a true and correct copy of the above **JOINT MOTION TO APPROVE CONFIDENTIAL SETTLEMENT AGREEMENT** was served through the Court's ECF notification system upon all counsel of record.

/s/Craig A. Cowart _____
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Attorneys for Defendant

EXHIBIT A

**[To be filed under seal by Clerk of Court following decision
on pending Joint Motion to File Confidential Settlement
Agreement Under Seal]**

4850-2121-6101, v. 3